From: <u>Todd HUDSON</u>

To: <u>Elizabeth Allen/R10/USEPA/US@EPA; Lori Cora/R10/USEPA/US@EPA; danab.marcia@deq.state; David G FARRER;</u>

Rene Fuentes/R10/USEPA/US@EPA; Joe Goulet/R10/USEPA/US@EPA; Chip Humphrey/R10/USEPA/US@EPA; ANDERSON Jim M; Karen BISHOP; Richard Kauffman/R10/USEPA/US@EPA; Kristine Koch/R10/USEPA/US@EPA; MCCLINCY Matt; POULSEN Mike; Dan Phalen/R10/USEPA/US@EPA; Sean Sheldrake/R10/USEPA/US@EPA; Burt

Shephard/R10/USEPA/US@EPA; Deb Yamamoto/R10/USEPA/US@EPA

Subject: RE: PLEASE HELP - Five minute review request - Portland HarborRisk Confusion

Date: 08/03/2011 03:25 PM

Hello everyone,

While the email I received don't have an attached text box, I have ATSDR's Public Health Assessment Guidance Manual in front of me. Here are some points that may prove useful:

- A quantitative risk assessment is used by regulators as part of the site remediation process. It represents a theorhetical risk.
- A public health assessment considers similar data, but focuses on site-specific exposure conditions. This is used to identify harmful exposures and recommend actions to protect public health. It also examines health outcome data (e.g., cancer registry data) and community-based information such as community health concerns.
- A risk assessment considers all contaminated media regardless if exposures are occurring or are likely to occur.
- A public health assessment focuses on site-specific exposure conditions, and only considers contamination where there is a completed exposure pathway.
- A public health assessment also considers past exposures.
- Quantitative risk assessments are often used for regulatory purposes and do not provide perspective on what the risk estimates mean in the context of the community affected by the site - the public health assessment process does.

>>> "ANDERSON Jim M" <ANDERSON.Jim@deq.state.or.us> 8/3/2011 2:13 PM >>>

Dan,

I agree with Mike P, plus I think I'll take it step further by offering 2 comments.

1st, sorry to be critical, but your draft doesn't really help to explain

the significant & important differences between the 2 types of risk assessments. I think the text box as is will create more confusion in the regulated community & public than by staying silent. So, I think it needs to be re-worked. I know we've said this numerous times in the PH project, but like so many other PH issues..., this isn't a new or unique issue..., doesn't EPA have canned language or guidance that we can use as a starting point?

2nd, here are the PP bullets Dave Stone used in his 4/14/11 Rep Earl Blumenauer presentation:

- -Public Health Approach
 - -semi-quantitative
 - -health benefits considered
 - -often implemented thru outreach/engagement
 - -typically based on recommendations & guidelines
 - -population-based risk
- -Regulatory (EPA) Approach
 - -quantitative & detailed process
 - -often prescribed in statute
 - -used to inform management decisions
 - -addresses uncertainty & variability
 - -human risk often inferred from animal models
 - -data requirements are often high

Jim Anderson Manager, DEQ Portland Harbor Section ph: 503.229.6825

fax: 503.229.6899 cell: 971.563.1434

----Original Message----

From: POULSEN Mike

Sent: Wednesday, August 03, 2011 1:56 PM

To: 'Dan Phalen'; allen.elizabeth@epa.gov; Chip Humphrey; Deb Yamamoto; fuentes.rene@epa.gov; Joe Goulet; Lori Cora; Sean Sheldrake; shephard.burt@epa.gov; Kristine Koch; FARRER David.G; Richard Kauffman; ANDERSON Jim M; BISHOP Karen; danab.marcia@deq.state; MCCLINCY Matt Cc: 'Todd HUDSON'

Subject: RE: PLEASE HELP - Five minute review request - Portland Harbor Risk Confusion

Dan -

This sounded a bit urgent, so I will give you my quick review. I think it may help to start with the similarities and then make a clearer distinction between EPA and ATSDR risk assessments. They both identify likely exposure pathways and potentially exposed populations. They both characterize risk.

Differences -

ATSDR provides an assessment of risk independent of EPA.

ATSDR can include non-chemical risks, including physical and biological. EPA sticks to chemical risk.

ATSDR can balance risks and benefits. EPA does not.

The different agencies have different criteria for acceptable risk, which may result in different conclusions.

EPA evaluates ecological risks in addition to human health risks.

- Mike

----Original Message----

From: Dan Phalen [mailto:Phalen.Dan@epamail.epa.gov]

Sent: Wednesday, August 03, 2011 1:12 PM

To: allen.elizabeth@epa.gov; Chip Humphrey; Dan Phalen; Deb Yamamoto; fuentes.rene@epa.gov; Joe Goulet; Lori Cora; Sean Sheldrake;

shephard.burt@epa.gov; Kristine Koch; FARRER David.G; Richard Kauffman;
ANDERSON Jim M; BISHOP Karen; danab.marcia@deq.state; POULSEN Mike;

MCCLINCY Matt

Subject: PLEASE HELP - Five minute review request - Portland Harbor Risk

Confusion

Importance: High

This email is going out to EPA's internal PH Team, as well as key folks at DEQ, OHA and ATSDR.

The review shouldn't take more than 5 minutes of your time. We need a quick turn around on this in anticipation of ATSDRs approval of the final PHA and pending revisions to a number of fact sheets.

There has been considerable confusion among the public, the media and others about the differences between Public Health Assessments and Risk Assessments. We need a very simple and brief explanation to use, when appropriate, on Portland Harbor fact sheets to help the public understand the differences and to ensure that we all have a consistent message that we have agreed to in advance.

The attached text box has been reviewed and improved by several of you, but it needs a bit further vetting to make sure it is consistent with the perspectives of the various agencies and disciplines involved.

Please review this at your earliest convenience and return any comments you may have to me via email. Once we come to a general consensus on the language internally (within EPA, DEQ, OHA, and ATSDR) I will then ensure that the LWG and CAG adopt the same language and descriptions in their presentation and fact sheets.

(See attached file: DRAFT-Risk_Assessment_Comparison_Text_Box-V2.docx)

Thanks in advance...

Dan

Dan Phalen - Environmental Education & Community Involvement - US EPA, Region 10 - 206-553-8578